



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

October 23, 2024

By ECF

The Honorable Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Chan, et al. v. U.S. Dep't of Transp., et al.*, No. 23 Civ. 10365 (LJL)
New Yorkers, et al. v. U.S. Dep't of Transp., et al., No. 24 Civ. 367 (LJL)
Mulgrew, et al. v. U.S. Dep't of Transp., et al., No. 24 Civ. 1644 (LJL)

Dear Judge Liman:

This Office represents the Federal Defendants in the above-captioned case. We write with the consent of plaintiffs and co-defendants to request that the Court exempt the Federal Defendants from filing the entire supplemental administrative record on the electronic docket of this case. Instead, the Federal Defendants propose to file a notice of lodging, record index, and supporting documents electronically via ECF, while simultaneously providing electronic versions of the supplemental record documents and a hyperlinked index to the record to the Court on flash drives and to the parties on flash drives and/or through a file share. This is the procedure that the Court allowed in the earlier phase of this litigation.

Upon request of the Court, the Federal Defendants can facilitate compilation of an appendix of record materials cited by the parties during merits briefing for filing on the docket. Filing only those selections from the record will avoid cluttering the docket and provide the Court with a tailored set of record materials based on the briefing.

We thank the Court for its consideration of this request.

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Zachary Bannon
ZACHARY BANNON
DOMINIKA TARCZYNSKA
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007